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7 BEFORE THE INSURANCE COMMISSIONER
8 OF THE STATE OF WASHINGTON

9 In the Matter of the Application
10 regarding the Conversion and
11 Acquisition of Control of Premera Blue
12 Cross and its Affiliates.
13

No. G 02-45

REQUEST FOR THREE OF THE
INTERVENOR GROUPS TO
PRODUCE REQUESTED
DOCUMENTS BY NOVEMBER 10,
2003

14 To: Premera Watch Group, the Hospital Associations, and the Washington
15 State Medical Association and to the respective Lead Attorneys for each of these
three Intervenor Groups

16 Premera hereby requests that each of these three Intervenor Groups produce all
17 documents responsive to the Amended First Set of Document Requests for each
18 Intervenor Group by **November 10, 2003**.

19 The Amended First Sets were served on October 21st and the original First Sets
20 were served on October 17th. The original First Sets had basically the same document
21 requests as the Amended First Sets but also included Interrogatories, which were deleted
22 from the Amended First Set. Thus, the Intervenor Groups had notice of the document
23 requests as of October 17th.

24 This request for the Intervenor Groups to produce the documents either ten days
25 earlier (if the October 21st service date is chosen) or seven days earlier (if the October 17th

REQUEST FOR THREE OF THE INTERVENOR
GROUPS TO PRODUCE REQUESTED
DOCUMENTS BY NOVEMBER 10, 2003 - 1

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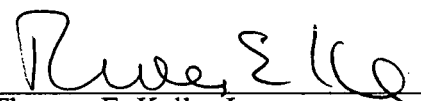
1 service date is chosen) is based on the need of Premera's attorneys to have the responsive
2 documents at least a few days before the depositions of Intervenor Groups' experts are
3 scheduled to be taken. Currently, the depositions of the Premera Watch Group's experts
4 are to be taken on November 12th; those of the Washington State Medical Association are
5 to be taken on November 13th; and those of the Hospital Associations on November 14th.
6 Since Premera has scheduled the depositions of the Alaska Intervenor's experts for
7 November 25th, it is the expectation of Premera that it will have received all of that
8 Intervenor Group's responsive documents well in advance of the depositions.

9 This request is supported by Paragraph 3(d) of the Commissioner's Seventeenth
10 Order herein ("Every effort should be made by the parties to cooperate and produce
11 documents as quickly as possible").

12 Premera requests that each of the three Intervenor Groups advise Premera by the
13 end of business on November 4th as to whether each will be producing their responsive
14 documents by November 10th, so that, if the answer is no, Premera can move the Special
15 Master to compel the earlier production.

16 DATED this 3rd day of November, 2003.

17 PRESTON GATES & ELLIS LLP
18

19 By 
20 Thomas E. Kelly, Jr., WSBA # 05690
21 Attorneys for Applicant
22 PREMERA and Premera Blue Cross
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REQUEST FOR THREE OF THE INTERVENOR
GROUPS TO PRODUCE REQUESTED
DOCUMENTS BY NOVEMBER 10, 2003 - 2

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